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13 UNITED STATES DISTRICT COURT
14 NORTHERN DISTRICT OF CALIFORNIA

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WALTER SPURLOCK and ANDRE
GUIBERT,

Plaintiffs,

v.

CITY AND COUNTY OF SAN
FRANCISCO, AIRPORT COMMISSION OF
THE CITY AND COUNTY OF SAN
FRANCISCO, KEABOKA MOLWANE in his
individual capacity and official capacity as
Aviation Security and Regulatory Compliance
Officer at the San Francisco International
Airport, and JEFF LITTLEFIELD in his
individual capacity and official capacity as
Chief Operating Officer at San Francisco
International Airport,

Defendants.

Case No. 3:23-cv-4429

**DECLARATION OF MOLLY J. ALARCON
IN SUPPORT OF DEFENDANTS'
MODIFICATION TO THE NORTHERN
DISTRICT MODEL STIPULATED
PROTECTIVE ORDER**

DECLARATION

I, Molly J. Alarcon, declare as follows:

1. I am an attorney duly licensed to practice law in California, and a Deputy City Attorney for the City and County of San Francisco assigned to represent Defendants the City and County of San Francisco, the Airport Commission of the City and County of San Francisco, Jeff Littlefield, and Keaboka Molwane in the above-captioned case. I have personal knowledge of the matters stated herein and, if called upon, I could and would testify competently to the contents of this Declaration.

2. The standing order for the Honorable Araceli Martínez-Olguín states that parties seeking to enter a protective order that departs from the model protective order in the Northern District of California must include “a declaration explaining each modification to the model order, along with a redline version comparing the proposed order with the model order.” This declaration is submitted in accordance with that requirement.

3. The proposed stipulated protective order departs from the model protective order by adding language in two places (first, in the definition of “confidential information or items” and second, in the definition of “protected material”) to include information that is “Sensitive Security Information,” as defined by Federal Regulation 49 C.F.R. Part 1520. The modifications are appropriate given that Defendants have an obligation under 49 C.F.R. Part 1520 to keep Sensitive Security Information confidential and to avoid public disclosure of such information.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed this 5th day of January, 2024 in San Francisco, California.

/S/ *Molly Alarcon*

MOLLY J. ALARCON